



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

NOTES OF CASES.

NEGLIGENCE—DEFINITION BY SUPREME COURT OF UTAH.—Negligence is the failure to observe for the protection of another's interests and safety such care, precaution and vigilance as the circumstances justly demand, and the want of which causes the injury. *Downey v. Gemini Mfg. Co.* (Utah), 68 Pac. 414.

PARENT AND CHILD—RIGHTS OF ILLEGITIMATE CHILD.—An illegitimate child is held, in *Lavigne v. Ligue Des Patriotes* (Mass.), 54 L. R. A. 814, not to be a child or relative of her father, as those words are used in a statute designating the persons who may be beneficiaries in certificates of mutual benefit associations.

CONTRACTS IN RESTRAINT OF TRADE.—A contract not to engage in the barber business in any manner in a certain town, made by the owner of a barber shop on the sale of his furniture, tools, and fixtures, is held, in *Pohlman v. Dawson* (Kan.), 54 L. R. A. 913, to be violated by his working as an employee in another barber shop in the town.

CRIMINAL LAW—MANSLAUGHTER—IDENTITY OF VICTIM.—In the absence of actual malice, manslaughter, and not murder, is held, in *State v. Yanz* (Conn.), 54 L. R. A. 780, to be committed by killing a man while reasonably believing from the circumstances that he is in the act of adultery with assailant's wife, although the assailant is in fact mistaken.

ADVERSE POSSESSION—PRINCIPAL AND AGENT.—An agent's occupancy of a house on his principal's property, as a part merely of the contract for services, is held, in *Davis v. Williams* (Ala.), 54 L. R. A. 749, not to establish the relation of tenant and landlord between him and the principal, so as to preclude him from acquiring an adverse title to the property.

TELEGRAPH COMPANIES—LIABILITY FOR MALICIOUS ACT OF OPERATOR.—A telegraph company is held, in *Pacific Postal Teleg. Cable Co. v. Bank of Pao Alto* (C. C. A. 9th C.), 54 L. R. A. 711, to be liable for losses caused by a false telegram wilfully transmitted by an operator employed in its office, directing a bank to pay money on account of a correspondent bank.

CONSTITUTIONAL LAW—DISCRIMINATION AS TO CLASSES.—A restriction of the number of persons which lodging-house keepers may permit to occupy one room during the same night is held, in *Bailey v. People* (Ill.), 54 L. R. A. 838, to be a deprivation of property without due process of law, because of the discrimination in limiting the provision to lodging-house keepers.